

# Exhibit F

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK**

Colorado, the District of Columbia, Florida, Hawaii, Illinois, Iowa, Kansas, Maine\*, Massachusetts\*, Michigan, Minnesota, Mississippi, Missouri\*, Montana\*, Nebraska, Nevada, New Hampshire, New Mexico, New York, North Carolina, North Dakota, Oregon, Rhode Island, South Dakota, Tennessee, Utah, Vermont\*, West Virginia, and Wisconsin from May 1, 2015, through July 31, 2021 (in the case of Arkansas only, through July 31, 2017), for consumption by themselves, their families, or their members, employees, insureds, participants, or beneficiaries. In the states marked with an asterisk, Settlement Class Members are only consumers, not TPPs.

Excluded from the Settlement Class are: Allergan, its officers, directors, employees, subsidiaries, and affiliates; all federal and state government entities except for cities, towns, municipalities, or counties with self-funded prescription drug plans; all persons or entities who purchased Restasis for purposes of resale or directly from Allergan or its affiliates; fully insured health plans, *i.e.*, plans that purchased insurance covering 100 percent of their reimbursement obligations to members; any “flat copay” consumers who purchased Restasis only via a fixed dollar copayment that does not vary on the basis of the drug’s status as brand or generic; pharmacy benefit managers; and all judges assigned to this case and their chambers staff and any members of the judges’ or chambers staffs’ immediate families.

4. The Notice Plan (attached as Exhibit A) includes notice via U.S. Mail, digital media, print media, and earned media.

5. The Notice Plan described in this Declaration is consistent with recent A.B. Data notice plans that have been approved by courts and implemented for similar pharmaceutical cases,

including:

- *Hospital Authority of Metropolitan Government of Nashville and Davidson County, Tennessee v. Momenta Pharmaceuticals, Inc. et al.*, (Case No. 3:15-cv-01100) (M.D. Tenn.)
- *In re Aggrenox Antitrust Litigation* (Case No. 3:14-md-02516) (D. Conn.)
- *In re Solodyn Minocycline Hydrochloride All End-Payor Actions* (MDL No. 14-md-2503 DJC) (D. Mass.)
- *State of New York, et al. v. Cephalon, Inc., et al.* (Civil Action No. 16-cv-01833) (E.D. Pa.)
- *Shannon Mahoney v. Endo Health Solutions, Inc., et al.* (Case No. 15-cv-9841) (DLC) (S.D.N.Y.)
- *Cipro Cases I and II* (Judicial Council Coordination Proceedings Nos. 4154 and 4220, Superior Court of the State of California, County of San Diego)

#### **Digital Media**

6. Banner ads will be placed via Google Display Network, a platform with more than two million websites, videos, and apps where Google ads can appear. Ads will be served on targeted websites and across multiple devices, including desktop, tablet, and mobile devices. Ads will be placed in premium positioning on websites and social media sites, ensuring that they can be easily seen when viewers first open website pages.

7. Digital advertising will include an embedded link to the case-specific website, allowing the viewer to click on a banner or newsfeed advertisement and instantly be directed to the case website.

8. Images appropriate for this Action and target audience will also be included in all digital ad formats, as this increases the visibility and click-through rate of the ads. A.B. Data will seek any necessary permissions from Allergan regarding the use of the brand name Restasis in the notice plan. Consumer and TPP banner ad examples are included in the attached Notice Plan.

9. A 60-day campaign will be scheduled, which ensures ample time to deliver the targeted impressions. At least 265 million targeted impressions will be delivered to the target audience.

10. The following campaign microtargeting optimization strategies will be utilized:

Strategy	Rationale
Mobile – In-App	Targeting users inside mobile applications that fit into our data pools. This could include health and medical apps, game apps, weather apps, or entertainment/cooking apps.
Mobile – Websites	Targeting phones and tablets whose users are visiting websites that are contextually relevant or websites being visited by relevant users in our data pool.
Contextual Targeting	Targeting websites with relevant content and context, such as those that provide health, medical, and lifestyle information, will help capture potential Settlement Class Members who were not in previous data-targeting pools but who have an interest in these topics.
Behavioral Targeting	Targeting user IDs across the internet whose owners have shown activity in the past or placed themselves in data pools of our audience. For example: user is located in one of the Settlement Class States, age 50+, and has searched for information relating to dry eye issues.
Predictive (Look-Alike) Modeling	Using look-alike modeling to target user IDs whose owners have strong similarities to users who have previously clicked through to the case website.

### **Social Media**

11. To further extend engagement with potential Settlement Class Members, newsfeed ads will be purchased on Facebook, Instagram, and YouTube. Impressions served to social media

users can be highly targeted, specifically reaching those who have expressed an interest in information relevant to the subject of this case, such as dry eye issues. By utilizing microtargeting strategies, we can be very tactical in reaching potential Settlement Class Members, and encouraging them to register on the case website. A case-specific Facebook page will also be created as a landing page for the links in the Facebook and Instagram newsfeed ads.

### **Google AdWords/Search**

12. To assist with easy location of the case website, sponsored search listings will be acquired on Google, the most highly visited search engine. When identified target phrases and keywords are used in searches on Google, links will appear on the search result pages. Representative keywords could include “Restasis,” “chronic dry eyes,” “tear duct issues,” plus many others.

### **Print Media**

13. The Short-Form Notice will also be published one time each in *People* magazine and *AARP, The Bulletin*. *People* offers a broad reach of the target audience as one of the leading consumer magazines in the United States. *AARP, The Bulletin* is affiliated with American Association of Retired Persons (“AARP”) and is mailed 10 times annually to their members. *People* and *AARP, The Bulletin* are also important components of the Notice Plan as they provide notice to segments of the population that are not frequent users of digital or social media.

### **Targeted Third-Party Payor (“TPP”) Notice**

14. To reach third-party payors (“TPPs”) and related entities, in addition to direct postcard notice to TPPs (Exhibit D) and related entities, a banner ad campaign will be purchased to be carried via the website [ThinkAdvisor.com/life-health](http://ThinkAdvisor.com/life-health). This website is affiliated with the former publication *National Underwriter Life & Health*. It is uniquely positioned to provide insurance agents, brokers, and TPP administrators with timely, insightful information as

they navigate the specialty insurance markets and sort through critical industry developments. All banner ads will include an embedded link to the case-specific website. The banner ads produced will be colorful and appealing, while including text about the case and the litigation.

15. A.B. Data maintains a proprietary database of approximately 40,000 entities that include insurance companies; health maintenance organizations; self-insured entities such as certain large corporations, labor unions, and employee benefit and pension plans; and certain record keepers, such as pharmacy benefit managers and third-party administrators. This database had been compiled from numerous prior name-brand and generic drug litigations that A.B. Data has administered. Postcard notice in a form approved by the Court will be sent directly to each TPP identified in this database. In addition, A.B. Data will send emails to potential TPP Settlement Class Members to the extent that email addresses are available. Included within the email notices will be a link allowing recipients to view the full, detailed notice package.

#### **Earned Media**

16. A.B. Data will disseminate a news release via *PR Newswire*'s US1 Newswire distribution list. This news release will be distributed to the news desks of approximately 10,000 newsrooms, including those of print, broadcast, and digital websites across the United States. News about the litigation will also be sent via Twitter to the followers of *PR Newswire* and A.B. Data.

#### **Toll-Free Telephone Number**

17. A.B. Data will establish and maintain a case-specific toll-free telephone number to support the litigation, with live operators during business hours. Services will specifically include the following:

- a. Inbound toll-free line;

- b. Interactive-voice-response system;
- c. Live operators during business hours;
- d. Call scripts developed by our experts and approved by Class Counsel; and
- e. Detailed reporting.

### **Case Website**

18. A dedicated case website will be developed to complement the Notice Plan and to ensure Settlement Class Members' easy access to updated information, as well as to provide a convenient online platform for submitting claims. The website will be secure, with an "https" designation. The website will provide, among other things, a summary of the case and Settlement Class Member rights and options, a copy of the Long-Form Notice, functionality for the Settlement Class Members to register for future case information online, all relevant documents, important dates, and any pertinent updates concerning the litigation process. Google Analytics and Facebook Pixel tracking codes will be placed on the website to ensure accurate optimization.

### **Form and Content of Notice**

19. A Short-Form Notice, attached as Exhibit B, will be used to provide Notice in the press release, as described in more detail above. The Short-Form Notice includes summary information concerning the Action, including: that this is a class action; the definition of the Settlement Class in plain and engaging language; that the Settlement Class alleges antitrust claims; that a Settlement Class Member may appear through an attorney if the Settlement Class Member desires; that Settlement Class Members can request exclusion, and the time and manner for requesting exclusion; and the binding effect of a class judgment. The Short-Form Notice also includes the website address and toll-free telephone number via which Settlement Class Members can obtain additional details about the litigation and background information about the Action.



20. A more detailed Long-Form Notice, attached as Exhibit C, will be available on the case website and will include more detailed information about the Action, including an in-depth explanation of Settlement Class Members' rights and options. The Long-Form Notice will also provide information regarding how class members can submit claims online or via mail.

21. Both Notices are designed to encourage readership and understanding in a well-organized and reader-friendly format.

### **Relevant Experience**

22. As the Vice President, Media, for the Class Action Administration Company of A.B. Data, Ltd., I provide a broad range of services, including market research and analysis, creative development, advertising, and marketing planning. My curriculum vitae is attached as Exhibit D.

23. I have developed and directed some of the largest and most complex national notification plans in the United States. The scope of my work includes notification plans in consumer pharmaceutical antitrust litigation, general consumer and antitrust litigation, securities settlements, ERISA settlements, and insurance settlements. I have developed or consulted on hundreds of notification plans, placing millions of dollars' worth of media notice. Selected cases include the following:

#### **Antitrust/Commodities Cases:**

- *Laydon v. Mizuho Bank, Ltd., et al.*, No. 12-CV-3419 (GBD) and *Sonterra Capital Master Fund Ltd., et al. v. UBS AG, et al.*, No. 15-CV-5844 (GBD), United States District Court, Southern District of New York;
- *Sullivan v. Barclays plc et al.*, No. 13-cv-028111 (PKC), United States District Court, Southern District of New York;
- *In re Loestrin 24 FE Antitrust Litigation*, Case No. MDL 2472, United States District Court, District of Rhode Island;

- *In re Resistors Antitrust Litigation*, No. 3:15-cv-03820-JD, United States District Court, Northern District of California;
- *In re Qualcomm Antitrust Litigation*, No. 17-md-02773-LHK, United States District Court, Northern District of California;
- *State of Washington v. LG Electronics, Inc., et al.*, No. 12-2-15842-8 SEA, State of Washington, King County Superior Court;
- *The State of New York, et al. v. Cephalon, Inc., et al.*, No. 16-cv-4234-MSG, United States District Court, Eastern District of Pennsylvania;
- *In re Liquid Aluminum Sulfate Antitrust Litigation*, No. 16-md-2687 (JLL) (JAD), United States District Court, District of New Jersey;
- *In re Aggrenox Antitrust Litigation*, No. 3:14-md-02516 (SRU), United States District Court, District of Connecticut;
- *In re Solodyn (Minocycline Hydrochloride) Antitrust Litigation (All End-Payor Actions)*, MDL No. 14-MD-2503-DJC, United States District Court, District of Massachusetts;
- *In re Capacitors Antitrust Litigations: All Indirect Purchaser Actions*, No. 14-CV-03264-JD, United States District Court, Northern District of California;
- *In re Polyurethane Foam Antitrust Litigation*, MDL Docket No. 2196, United States District Court, Northern District of Ohio;
- *In re Medco Health Solutions, Inc. Pharmacy Benefits Management Litigation*, MDL No. 1508, United States District Court, Southern District of New York;
- *In re Warfarin Sodium Antitrust Litigation*, MDL No. 98-1232 (SLR), United States District Court, District of Delaware;
- *Blevins v. Wyeth-Ayerst Laboratories, Inc. and American Home Products Corp.*, No. 324380, Superior Court of California, County of San Francisco;
- *In re Terazosin Hydrochloride Antitrust Litigation*, 99-MDL-1317, United States District Court, Southern District of Florida;
- *In re Cardizem CD Antitrust Litigation*, 99-MD-1278, United States District Court, Eastern District of Michigan;
- *In re High Pressure Laminate Antitrust Litigation*, Civil Action No. 00C-1989 and Related Cases, Second Circuit Court for Davidson County, Tennessee, 20<sup>th</sup> Judicial District at Nashville;

- *In re Pennsylvania Baycol Third-Party Payor Litigation*, September Term, 2001 No. 001874, Court of Common Pleas, Philadelphia County, South Carolina;
- *In re Remeron End-Payor Antitrust Litigation*, Master File No. 02-CV-2007 (FSH), United States District Court, District of New Jersey;
- *In re Relafen Antitrust Litigation*, 01-12239-WGY, United States District Court, District of Massachusetts;
- *In re Buspirone Antitrust*, 01-MD-01413, United States District Court, Southern District of New York;
- *Rosemarie Ryan House, et al. v. GlaxoSmithKline PLC and SmithKline Beecham Corporation*, No. 2:02cv442, United States District Court, Eastern District of Virginia;
- *Cipro Cases I and II*, Judicial Council Coordination Proceedings Nos. 4154 and 4220, Superior Court of the State of California, County of San Diego;
- *In re Potash Antitrust Litigation (II)*, No. 1:08-CV-6910, United States District Court, Northern District of Illinois;
- *In re Optiver Commodities Litigation*, No. 1:08-CV-06842-LAP, United States District Court, Southern District of New York;
- *In re: Rough Rice Commodity Litigation*, No. 11-CV-00618, United States District Court, Northern District of Illinois;
- *In re Platinum and Palladium Commodities Litigation (Platinum/Palladium Futures Action)*, 10-CV-3617 (WHP) (“Futures Action”), United States District Court, Southern District of New York;
- *In re Platinum and Palladium Commodities Litigation (Platinum/Palladium Physical Action)*, 10-CV-3617 (WHP) (“Physical Action”), United States District Court, Southern District of New York;
- *Kamakahi and Levy v. American Society for Reproductive Medicine and Society for Assisted Reproductive Technology*, No. 3:11-CV-1781 JCS, United States District Court, Northern District of California;
- *Mahoney v. Endo Health Solutions, Inc., et al.*, No. 15-CV-9841 (DLC), United States District Court, Southern District of New York;

### Consumer Cases:

- *Charles Roberts, an individual, and Kenneth McKay, an individual, on Behalf of Themselves and Others Similarly Situated v. C.R. England, Inc., a Utah Corporation; and Opportunity Leasing, Inc., a Utah Corporation*, Civil Case No. 2:12-cv-00302, United States District Court, District of Utah;
- *State of Washington v. Motel 6 Operating L.P. and G6 Hospitality LLC*, No. 18-2-00283-4 SEA, Superior Court of the State of Washington, King County;
- *Wave Lengths Hair Salons of Florida, Inc., on Behalf of Itself and All Others Similarly Situated, d/b/a Salon Adrian v. CBL & Associates Properties, Inc., CBL & Associates Management, Inc., CBL & Associates Limited Partnership, and JC Gulf Coast Town Center, LLC*, No. 2:16-cv-206-FtM-PAM-MRM, United States District Court, Middle District of Florida;
- *In re: Vizio, Inc., Consumer Privacy Litigation*, No. 8:16-ml-02693-JLS (KESx), United States District Court, Central District of California;
- *In re Google LLC Streetview Electronic Communications Litigation*, Case No. 5:10-md-02184, United States District Court, Northern District of California;
- *MSPA Claims I, LLC v. Ocean Harbor Cas. Ins. Co.*, No. 2015-1946 CA-01, Circuit Court of the 11<sup>th</sup> Judicial Circuit in and for Miami-Dade County, Florida;
- *Valle v. Popular Community Bank*, No. 653936/2012, Supreme Court, State of New York, County of New York;
- *Bizarro, et al., v. Ocean County*, No. OCN-1644-17, Superior Court of New Jersey, Law Division, Ocean County;
- *Christina Martin et al. v. the State of Washington, et al.*, No 14-2-00016-7, Superior Court, State of Washington, County of Spokane;
- *Picant v. Premier Cruise Lines*, 96-06932-CA-FN, 18th Judicial Circuit, State of Florida;
- *McParland and Picking v. Keystone Health Plan Central, Inc.*, Civil Action No. 98-SU- 00770-01, Court of Common Pleas, York County, Pennsylvania;
- *Smith v. American Family Mutual Automobile Insurance Co.*, No. 00-CV-211554, Circuit Court of Jackson County, Missouri;
- *Phil Shin, on Behalf of Himself and All Others Similarly Situated v. Plantronics, Inc.*, No. 5:18-cv-05626-NC, United States District Court, Northern District of California;

- *Lincoln Adventures, LLC, a Delaware Limited Liability Company and Michigan Multi-King, Inc., a Michigan Corporation, on Behalf of Themselves and All Those Similarly Situated v. Those Certain Underwriters at Lloyd's, London Members of Syndicates, et al.*, No. 2:08-cv-00235-CCC-JAD, United States District Court, Court of New Jersey;
- *Scott Meeker and Erin Meeker, Kelly Goodwin, Bruce Ely and Kristi Hauke, Elizabeth Borte and Rino Pasini, Christian Miner, and Judy Sanseri and Howard Banich; Individually and on Behalf of All Others Similarly Situated v. Bullseye Glass Co., an Oregon Corporation*, Civil Action No. 16CV07002, In the Circuit Court of the State of Oregon, for the County of Multnomah;
- *Duncan v. The Unity Life and Accident Insurance Association, et al.*, Civil Action No. 00-CIV-7621, United States District Court, Southern District of New York;
- *Duncan v. Columbian Protective Association of Binghamton, New York, and Columbian Mutual Life Insurance Company*, No. 00 CIV. 7236 (JGK), United States District Court, Southern District of New York;
- *Watkins, as Executrix of the Estate of Hines, and as Beneficiary of the Adult Whole Life Industrial Policy of Hines, v. Columbian Mutual Life Insurance Company, a Subsidiary of Columbian Financial Group, and Golden Eagle Mutual Life Insurance Corporation*, No. 03 CIV. 8620 (JGK), United States District Court, Southern District of New York;
- *In re: Benzion v. Vivint, Inc.*, No. 12-CV-61826-WJZ, United States District Court, Southern District of Florida;
- *In re: ADT Security Services, Inc.*, No. 1:11-CV-1925, United States District Court, Northeastern District of Illinois;
- *The State of Illinois v. Au Optronics Corporation, et al.*, No. 10 CH 34472, Circuit Court of Cook County, Illinois;
- *State of Washington v. AU Optronics Corporation, et al.*, No. 10-2-29164-4 SEA, King County Superior Court, Washington;
- *LLE One, LLC, et al. v. Facebook, Inc.*, Case No. 4:16-cv-06232-JSW, United States District Court, Northern District of California;
- *Mey v. Interstate National Dealer Services, Inc., et al.*, No. 1:14-CV-01846-ELR, United States District Court, Northern District of Georgia;
- *Estakhrian, et al., v. Obenstine, et al.*, No. CV11-3480-FMO (CWx), Nevada District Court;

- *Krakauer v. DISH Network, L.L.C.*, Civil Action No. 14-CV-333, United States District Court, Middle District of North Carolina;
- *Lofton v. Verizon Wireless (VAW) LLC*, No. 13-CV-05665-YGR, United States District Court, Northern District of California;
- *Lyons, et al., v. Litton Loan Servicing, LP, et al.*, No. 13-CV-00513, United States District Court, Southern District of New York;
- *Katz, et al. v. Live Nation, Inc., et al.*, Civil Action No. 1:09-CV-003740-MLC-DEA, United States District Court, District of New Jersey;
- *Bergman, et al. v. DAP Products Inc., et al.*, No. 14-CV-03205-RDB, United States District Court, District of Maryland;

#### **Securities Cases:**

- *Elkin v. Walter Investment Management Corp.*, No. 2:17-cv-02025-JCJ, United States District Court, Eastern District of Pennsylvania;
- *In re Flowers Foods, Inc. Securities Litigation*, No. 7:16-CV-00222 (WLS), United States District Court, Middle District of Georgia;
- *Steven Lazan v. Quantum Corporation, et. al.*, No. 3:18-cv-00923-RS, United States District Court, Northern District of California;
- *Cheng Jiangchen, Individually and on Behalf of All Others Similarly Situated v. Rentech, Inc., Keith B. Forman, and Jeffrey Spain*, No. 2:17-cv-01490-GW-FFM, United States District Court, Central District of California;
- *In re Medley Capital Stockholder Litigation*, No. 2019-0100-KSJM, The Court of Chancery of the State of Delaware;
- *Judith Godinez, Individually and on Behalf of All Others Similarly Situated v. Alere, Inc., et. al.*, No. 1:16-cv-10766-PBS, United States District Court, District of Massachusetts;
- *Edmund Murphy III, Individually and on Behalf of All Others Similarly Situated v. JBS S.A.*, No. 1:17-cv-03084-ILG-RER, United States District Court, Eastern District of New York;
- *In re Starz Stockholder Litigation*, No. 12584-VCG, The Court of Chancery of the State of Delaware;
- *In re Quality Systems, Inc. Securities Litigation*, No. 8:13-cv-01818-CJC-JPR, United States District Court, Central District of California;

- *In re PTC Therapeutics, Inc. Securities Litigation*, No. 16-1224 (KM)(MAH), United States District Court, District of New Jersey;
- *Aude, et al., v. Kobe Steel, Ltd., et al.*, No. 17-CV-10085-VSB, United States District Court, Southern District of New York;
- *Rahman v. GlobalSCAPE, Inc., et al.*, No. 5:17-cv-00753-XR, United States District Court, Western District of Texas;
- *In re CytRx Corporation Securities Litigation*, No. 2:16-CV-05519-SJO-SK, United States District Court, Central District of California;
- *In re CPI Card Group Inc. Securities Litigation*, No. 16-cv-04531 (LAK), United States District Court, Southern District of New York;
- *Singh v. 21Vianet Group, Inc.*, No. 2:14-cv-00894-JRG-RSP, United States District Court, Eastern District of Texas;
- *Kasper v. AAC Holdings, Inc., et al.*, No. 3:15-CV-00923-JPM, United States District Court, Middle District of Tennessee;
- *In re Facebook, Inc. IPO Securities and Derivative Litigation*, MDL No. 12-2389, United States District Court, Southern District of New York;
- *GFI Group, Inc. Securities Litigation*, No. 1:14-CV-09438 WHP, United States District Court, Southern District of New York;
- *In re Juno Therapeutics Inc.*, No. C16-1069 RSM, United States District Court, Western District of Washington at Seattle;
- *Zacharia v. Straight Path Communications, Inc. et al.*, Case No. 2:15-CV-08051-JMV-MF, United States District Court, District of New Jersey;
- *In re DFC Global Corp. Securities Litigation*, Civ. A. No. 2:13-CV-06731-BMS, United States District Court, Eastern District of Pennsylvania;
- *In re Berkshire Realty Company, Inc. Shareholder Litigation*, C.A. No. 17242, Court of Chancery for the State of Delaware in and for New Castle County;
- *Lipson, et al. v. Simon et al.*, 98-CV-4573 (TCP), United States District Court, Eastern District of New York;
- *In re Service Corporation International*, Civil Action H-99-280, United States District Court, Southern District of Texas;
- *Hicks v. Morgan Stanley & Co.*, 01 Civ. 10071 (RJH), United States District Court, Southern District of New York;



- *High Tide Harry's, Inc. v. Waste Management Inc. of Florida*, 05-CA-009441, 9th Judicial Circuit, State of Florida;
- *In re Campbell Soup Co. Securities Litigation*, 00-152-JEI, United States District Court, District of New Jersey;
- *Abrams v. Van Kampen Funds, Inc.* 01-C-7538, United States District Court, Northern District of Illinois;
- *In re Seitel, Inc. Securities Litigation*, No. 02-1566, United States District Court, Southern District of Texas;
- *Stevelman v. Alias Research, Inc.*, 591-CV-00682 (EBB), United States District Court, District of Connecticut;
- *In re Phoenix Leasing Limited Partnership Litigation*, No. 173739, Superior Court of the State of California, County of Marin;
- *In re Nuko Information Systems, Inc.*, C-97-20471 EAI, United States District Court, Northern District of California;
- *In re PriceSmart Securities Litigation*, Master File No. 03-CV-2260-JAH-(BLM), United States District Court, Southern District of California;
- *In re General Electric Co. Securities Litigation*, Civ. No. 09-CIV-1951 (DLC) ECF CASE, United States District Court, Southern District of New York;
- *In re PAR Pharmaceutical Securities Litigation*, Master File No. 2:06-03226 (ES) (SCM), United States District Court, District of New Jersey;
- *In re ING Groep, N.V. ERISA Litigation*, Master File No. 1:09-CV-00400-JEC, United States District Court, Northern District of Georgia;
- *In re Massey Energy Co. Securities Litigation*, Civil Action No. 5:10-CV-00689-ICB, United States District Court, Southern District of West Virginia;
- *In re Fannie Mae 2008 Securities Litigation*, No. 08-CV-7831, United States District Court, Southern District of New York;
- *In re 2014 Avon Products, Inc. ERISA Litigation*, Case No. 1:14-cv-10083, United States District Court, Southern District of New York;
- *In re BioScrip, Inc. Securities Litigation*, Civil Action No. 13-CV-6922-AJN, United States District Court, Southern District of New York;
- *In re BP plc Securities Litigation*, No. 4:10-MD-02185, United States District Court, Southern District of Texas;



- *The Department of the Treasury of the State of New Jersey and Its Division of Investment v. Cliffs Natural Resources Inc., et al.*, No. 1:14-CV-1031, United States District Court, Northern District of Ohio;
- *In re Eastman Kodak ERISA Litigation*, Master File No. 6:12-CV-06051 DGL, United States District Court, Western District of New York;
- *In re NII Holdings, Inc. Securities Litigation*, Civ. No. 1:14-CV-00227-LMB-JFA, United States District Court, Eastern District of Virginia;
- *In re Nu Skin Enterprises, Inc., Securities Litigation*, Master File No. 2:14-CV-00033-JNP-BCW, United States District Court, District of Utah;
- *Första AP-Fonden and Danske Invest Management A/S v. St. Jude Medical, Inc., et al.*, Civil No. 12-3070 (JNE/HB), United States District Court, District of Minnesota; and
- *In re TIBCO Software Inc. Stockholders Litigation*, Consolidated C.A. No. 10319-CB, Court of Chancery, State of Delaware

24. Additionally, my A.B. Data colleagues have developed and implemented notice plans in numerous antitrust cases, including *In re: Marine Hose Antitrust Litigation*, 08-MDL-1888, United States District Court, Southern District of Florida; *Ace Marine Rigging v. Virginia Harbor Services, Inc.*, SA-CV-11-00436, United States District Court, Central District of California; *In re: Iowa Ready-Mix Concrete Antitrust Litigation*, 5:10-CV-004038-MWB, United States District Court, Northern District of Iowa; and *In re Ready-Mixed Concrete Antitrust Litigation*, Case No. 1:05-cv-00979-SEB-JMS, United States District Court, Southern District of Indiana.

25. A.B. Data has also been appointed as Notice, Claims, and/or Settlement Administrator in hundreds of high-volume securities, antitrust, consumer, civil rights, insurance, ERISA, and wage and hour cases, administering some of the largest and most complex class action settlements of all time, involving all aspects of media, direct, and third-party notice plans, data management, claims administration, and settlement fund distribution.

### **Conclusion**

26. It is my opinion that the Notice Plan described herein reflects a strategic and contemporary method of deploying notice to this Settlement Class and is adequate and reasonable to reach the End-Payor Settlement Class Members effectively. Through a multi-media approach to notice that includes digital banner ads geo-targeted to the Settlement Class States and across the U.S., microtargeted digital notice, social media, earned media, and a plan targeted to Third-Party Payors, an estimated 82.6% of the target audience will be reached, on average 2.5 times, as calculated by MRI-Simmons, Comscore and A.B. Data media professionals. This Notice Plan provides a reach and frequency similar to those that courts have approved and are recommended by the Federal Judicial Center's *Judges' Class Action Notice and Claims Process Checklist and Plain Language Guide*. It is fully compliant with Rule 23 of the Federal Rules of Civil Procedure and is the best Notice Plan practicable under the circumstances.

I declare under penalty of perjury that the foregoing is true and correct.  
Executed this 7th day of October 2021 in Greenville, South Carolina.



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Linda V. Young

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